



Jonathan A. Bernstein, Partner  
Writer's Direct: (917) 693-7245; jb@lijblaw.com

June 23, 2022

**By ECF**

The Honorable Paul A. Engelmayer  
United States District Judge  
United States Court House  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Moraes v. White,  
21 Civ. 4743 (PAE)

Dear Judge Engelmayer:

We represent the Plaintiff in this matter. Defense counsel and I write jointly to request an extension of the deadline (currently June 24, 2022; ECF No. 59) for submission of the joint stipulation of undisputed facts in advance of the parties' cross-motions for summary judgment.

Briefly, the reason for the request is to accommodate the likely finalization of settlement. On June 2, 2022, Magistrate Judge Cave presided at a settlement conference, at which agreement in principle was reached with respect to most, but not all, issues. Although the remaining issues have taken longer than expected to resolve, counsel remain optimistic that they will resolve in the coming days.

Accordingly, we request extension of the JSF deadline to July 7, 2022. Such an extension will not require adjustment of any other date in the summary judgment briefing schedule. No prior request for extension of this date has been made.

Respectfully submitted,

/s/

Jonathan A. Bernstein

Granted. SO ORDERED.

1250 Broadway · 36th Floor · New York · New York 10001  
2108 Yardley Road · Yardley · Pennsylvania 19067  
Tel 215-493-1980 | 929-274-1151 | Fax 917-210-3898  
info@lijblaw.com | www.lijblaw.com

A handwritten signature in blue ink that reads "Paul A. Engelmayer".  
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PAUL A. ENGELMAYER  
United States District Judge  
June 23, 2022